

DavisPolk

Lawrence Portnoy
+1 212 450 4874
lawrence.portnoy@davispolk.com

Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017
davispolk.com

February 9, 2022

Re: *JPMorgan Chase Bank, National Association, London Branch v. Tesla, Inc.*, Case
No. 1:21-cv-9441 (PGG)

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Dear Judge Gardephe:

We represent Plaintiff JPMorgan Chase Bank, National Association, London Branch (“JPMorgan”) in the above-captioned action (the “Action”). Pursuant to Your Honor’s individual rule I(D), we write to request a one-week extension of JPMorgan’s deadline to respond to Defendant Tesla, Inc.’s (“Tesla”)’s Counterclaim filed on January 24, 2022 (“Counterclaim”), from the current deadline of February 14, 2022 to the proposed new deadline of February 21, 2022. JPMorgan has not previously requested an extension of this deadline and makes this request to fully evaluate its response to the Counterclaim. The parties have conferred and Tesla consents to the extension.

Respectfully submitted,

/s/ Lawrence Portnoy

Lawrence Portnoy

cc: All counsel of record (via ECF)